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AARON M. COHN, ESQ. (SBN 264756) 1 acohn@wwhgd.com WEINBERG WHEELER HUDGINS GUNN & DIAL, LLC 3350 Virginia Street, Suite 500 3 Miami, FL 33132 Telephone: (305) 455-9133 Facsimile: (305) 455-9501 Attorneys for Pétitioner 5 6 7 UNITED STATES DISTRICT COURT 8 CENTRAL DISTRICT OF CALIFORNIA 9 10 11 CHARLES WEATHERFORD, 12 Petitioner. 13 v. 14 SAFEGUARD METALS, LLC, a 15 California limited liability company, JEFFREY SANTULAN, individually, 16 Respondents. 17 18 19 20 21

CASE NO. 22-cv-07239-MEMF-MAR

MOTION TO APPEAR REMOTELY VIA ZOOM AT HEARING ON PETITION TO CONFIRM ARBITRATION AWARD

HEARING DATE: 03/16/2023 **HEARING TIME:** 10:00 a.m.

Hon. Mami

Ewusi-Mensah Frimpong

Counsel for Petitioner, Charles Weatherford ("Petitioner" or "Weatherford"), respectfully submits this motion to appear remotely at the hearing scheduled for March 16, 2023 at 10:00 a.m. on Petitioner's Petition to Confirm the Arbitration Award and, in support thereof, states as follows:

- 1. The Petition to Confirm the Arbitration Award is scheduled for March 16, 2023 at 10:00 a.m.
- 2. The final hearing was previously scheduled for January 19, 2023, and Counsel for Petitioner was previously granted leave to appear remotely at that hearing for good cause. (Dkt. 18).
 - 3. The hearing was rescheduled several times. (Dkt. 19, 20).
- 4. For the reasons the Court previously granted leave to appear remotely at the confirmation hearing, Petitioner requests permission to appear at the March 16, 2023 confirmation hearing. Specifically, Petitioner's counsel is located out-of-state and it would be a disproportionate burden to travel by plane for the hearing in light of the straight-forward nature of the requested relief.
- 5. This motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on November 7, 2022. Respondent does not oppose Petitioner's counsel's appearance via Zoom.

WHEREFORE, Petitioner requests entry of an Order authorizing a remote appearance by Zoom at the hearing scheduled for March 16, 2023 at 10:00 a.m. on Petitioner's Petition to Confirm the Arbitration Award.

DATED this 30th day of January, 2023.

/s/ Aaron M. Cohn Aaron M. Cohn, Esq. Cal Bar No. 264756

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Weinberg, Wheeler, Hudgins
Gunn & Dial, LLC, and that on the 30th day of January, 2023, the foregoing
MOTION TO APPEAR REMOTELY VIA ZOOM AT HEARING ON
PETITION TO CONFIRM ARBITRATION AWARD was served by e-service
in accordance with the Electronic Filing Procedures of the United States Distric
Court: Paul A. Rigali (SBN 262948) prigali@larsonllp.com cowens@larsonllp.com jbehnke@larsonllp.com hpark@larsonllp.com LARSON LLP 555 South Flower Street, Suite 4400 Los Angeles, California 90071 Telephone: (213) 436-4888 Fay: (213) 623-2000

/s/ Diana Mallqui
Diana Mallqui

